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Saturday, November 28, 1998

Ms. Kathleen McBride
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Via: Electronic Mail and United States Postal Service

COMMENTS ON THE INITIAL STUDY/ENVIRONMENTAL ASSESSMENT AND IN OPPOSITION TO THE PROPOSED NEGATIVE DECLARATION (CEQA) TO WIDEN HIGHWAY 101 AND CONSTRUCT SOUNDWALLS IN SONOMA COUNTY FROM THE WILFRED AVENUE INTERCHANGE TO THE ROUTE 101/12 SEPARATION

Dear Ms. McBride:

In accordance with the directions contained in the above-referenced Initial Study/Environmental Assessment (the "Initial Study" or "IS"), we, the undersigned residents of Sonoma County, California (the "Commenters"), hereby respectfully submit the following comments (the "Comments") on the Initial Study, opposing adoption of the proposed negative declaration (the "Negative Declaration") and urging that a full Environmental Impact Report ("EIR") be prepared.

Both the public interest and the specific requirements of the California Environmental Quality Act require that an EIR be prepared. This is true both because of the likely impacts of the proposed project (the "Project") *and* because the Project is, in fact, a portion or segment of a larger project or series of projects (hereinafter, collectively, the "Sonoma 101 Plan") which, cumulatively, are likely to have such impacts.

A full EIR should be prepared for the following reasons:

- The Project is not a single, standalone project. Rather, it is one of several phases of a much larger project and the cumulative impacts of the entire project must be considered in determining whether an EIR is required.

- The Initial Study/Environmental Assessment has been undertaken without due care and without consideration of multiple, obvious, significant and likely negative environmental impacts of the Project.

- The Initial Study fails to consider an important and obvious alternative which, substantial evidence suggests, would satisfy the goals of the Project better than the Preferred Alternative and which would be less likely to negatively impact the environment.

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- Caltrans' own calculations appear to support the No Build alternative over the Preferred Alternative.
- Contrary to Caltrans' proposed determination, it is likely that the Project, together with the Sonoma 101 Plan as a whole, will negatively impact water quality. There is a very real possibility of impacts which may endanger the quality and safety of the public water supply for 500,000 residents of Sonoma and Marin Counties. The Initial Study fails to adequately examine this possibility and the proposed Caltrans determination to the contrary is unsupported.
- The Project, together with the Sonoma 101 Plan as a whole, is likely to negatively impact existing and planned cultural and recreational facilities in the neighboring community and to cause harm to planned economic activities.
- The determination that the Project will not affect air quality is unfounded.

1. The Project is not a single, standalone project

A

CEQA requires that large projects not be segmented into numerous smaller component projects in order to avoid considering the cumulative impact on the environment. The Project is just such a component project and must not be considered out of context. Commenters believe that the component nature of the Project is obvious to all concerned and have reached the same conclusion as the court in a similar case: "The only reason we can infer for the. . . failure to consider and analyze this group of projects [is] that it was more expedient to ignore them." [1]

The Initial Study, itself, recognizes that the Project is "part of a larger effort"[2] and that projects like this are part of a "larger transportation improvement vision"[3] It is instructive to consider just how much larger this Sonoma 101 Plan really is.

In the Regional Transportation Plan, adopted 10/28/98, the Metropolitan Transportation Commission (the "MTC") lists the following "committed funding" and Track 1 projects along Highway 101 in Sonoma County:

- 94686 Widening, Santa Rosa Avenue – Route 12
- 96013 Widening, Wilfred Avenue – Santa Rosa Avenue
- 94688 Interchange improvements, Ranier Avenue, Petaluma
- 94165 HOV lanes, Route 12 – Steele Lane
- 94689 Arata Lane interchange, Windsor
- 94169 HOV lanes, Route 116 – Old Redwood Highway, Petaluma
- 98147 Widening, Petaluma – Marin County line
- 98183 HOV lanes, Steele Lane – River Road, Santa Rosa
- 98181 Modify interchange, Steele Lane, Santa Rosa

[1] *San Franciscans for Reasonable Growth v. City and County of San Francisco*, 151 Cal. App. 3d 61
[2] Initial Study § 2.3, page 10
[3] Ibid.

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In addition, numerous other transportation projects on nearby streets and roads are listed. Taken together, it is likely that these, also, could have significant cumulative environmental impact. Also, in November 1998, Sonoma County voters approved an advisory ballot measure supporting a number of transportation projects, including widening of Highway 101 between Windsor and the Marin County line. Cumulatively, these projects, planned, intended and/or under serious public consideration, entail the construction of approximately 80 new lane-miles of highway and significant modifications to numerous interchanges and related structures.

It is clear that the Project is but a small piece of the overall Sonoma 101 Plan. It is clear, also, that the other elements of the Sonoma 101 Plan are well-known to Caltrans as the lead agency for the Project and should be taken into consideration when evaluating potential environmental impacts. These individual elements must be viewed, together, as "reasonably foreseeable uses" which the California Supreme Court has ruled must be considered.[4] The facts of the proposed construction lead to an inescapable reasonable assumption that significant environmental impacts will result from the Project and from the Sonoma 101 Plan of which it is a part. Adoption of a Negative Declaration for a portion of the larger project fails to meet the requirements of CEQA and is inconsistent with the findings of the California courts.

2. The Initial Study has been undertaken without due care

B

The Initial Study's discussion of potential significant impacts[5] has been undertaken without sufficient thoroughness and care to ensure that significant information is provided to the public, or, indeed, to the lead agency itself. Only a cursory effort has been made to provide more than the "naked checklist" which the courts have found to be insufficient to meet CEQA's goal of providing information to the public and to the responsible agencies about potential environmental impacts.[6]

It is abundantly clear that formulation of the "discussion" was limited to matching the best available boilerplate to the checklist questions. Several examples are especially obvious:

- In discussing the negative response to the first question[7], which addresses the likelihood of appreciable changes to topography, we are blithely told that the Project will result only in "minor" topographic changes and that earthwork will be limited to widening the roadway and excavating for soundwalls. Commenters assert that it is self-evident that the construction of soundwalls in 14 locations along a 7.8 kilometer section of highway, in itself, constitutes an appreciable change in the topography. Caltrans apparently believes that it can deal with likely significant impacts simply by denying their existence.

- To Question 6[8], which asks about "an increase in the use of any natural resource," the response is that the Project "would not substantially change existing

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[4] *Laurel Heights Improvement District v. Regents of the University of California*, 47 Cal. App. 3d 276
[5] Initial Study, § 5 *et seq.*
[6] *Sundstrom v. Mendocino,* 202 Cal. App. 3d 296
[7] Initial Study, § 5.1, Question 1
[8] Initial Study, § 5.1, Question 6

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energy use patterns." The response may or may not be correct (we doubt that it is, and believe that an EIR is required to provide a definitive answer), but it is most certainly *not responsive* – it doesn't answer the question. Inasmuch as the Project involves highway construction, the merest momentary pause for consideration will result in recognition of the *inevitable* increased consumption of gravel and other aggregates, among other natural resources. These potential impacts must be studied.

- In discussing the response to Question 11[9], Caltrans states that the Project "would not involve substantial excavation affecting groundwater resources" and that there would be "no impact to any known drinking water supplies." This is, simply, an attempt to limit consideration of the effects of excavation for the Project only to excavation conducted at the site itself. It ignores the obvious potential for significant impacts of excavating gravel and other aggregates for the project. Such excavation is almost certain to take place in the gravel aquifer of the Russian River, which filters the public water supply for 500,000 residents of Sonoma and Marin Counties. This reasonably foreseeable effect must be evaluated. By itself, the failure to consider this likely impact is a fatal flaw in the Initial Study.

The foregoing are but three of many examples of the Initial Study's failure to adequately address the checklist questions and of its tendency to focus on the narrowest of all possible responses.

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3. *The Initial Study fails to consider an important alternative*

CEQA prohibits approval of a project if there are "feasible alternatives" available which would accomplish the stated goals while lessening significant impacts. The Initial Study fails to consider an important alternative which would likely exhibit just such characteristics.

The Metropolitan Transportation Commission has conducted a study[10] of the potential for a type of structure sometimes known as "express carpool lanes" to provide congestion relief on Highway 101 in Sonoma County. This study concluded that express carpool lanes would be 45% more effective at reducing congestion than the HOV lanes identified as the Preferred Alternative in the Initial Study. Inasmuch as Bob Kimsey, of the MTC, is identified as a consultant for the Initial Study, it seems reasonable to assume that Caltrans is aware of the MTC study.

Express carpool lanes have been implemented successfully on such California highways as State Route 91 (Orange County) and Interstate 15 (San Diego County). In each case, congestion-sensitive (time-of-day) pricing has been applied to specific lanes, resulting in significant congestion reduction.

Express carpool lanes permit free travel by carpools, vanpools, buses and other high-occupancy vehicles, just as HOV lanes do. However, express carpool lanes differ from HOV lanes in that they permit usage by single-occupant vehicles upon payment of tolls. By appropriately adjusting toll rates, express carpool lanes can be managed to maximize

[9] Initial Study, § 5.1, Question 11
[10] *Sonoma 101 Variable Pricing Study*, 1998 draft, Metropolitan Transportation Commission

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vehicle throughput, in contrast with HOV lanes, which are often underutilized. Additionally, optimization of traffic flows in express carpools lanes results in decreased congestion in mixed-use lanes and a general improvement in travel times for all road users. Because these conditions permit operation of vehicles at more efficient speeds and result in less engine idling and stop-and-go congestion, it is reasonable to expect that express carpool lanes will result in less impact on air quality than HOV lanes. The Initial Study is defective on its face for failure to include this widely known and well-documented alternative.

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4. Traffic studies support No Build over the Preferred Alternative

The primary major objective for the Project is to "[i]mprove travel times and reduce congestion."[11] Analysis of the projected travel times and delays presented in tables in the Initial Study[12], however, reveals that the Project will not come close to adequately achieving this objective and that shorter mixed flow travel times would generally be realized with the No Build alternative than with the preferred HOV lanes. The following examples are from the above-referenced tables.

- Year 2000, Southbound morning commute:
  - With HOV lanes = 19.8 minutes, No Build travel time = 19.9 minutes
- Year 2000, Northbound afternoon commute:
  - With HOV lanes = 20.9 minutes, No Build = 21.6 minutes
- Year 2020, Southbound morning commute:
  - With HOV lanes = 31.1 minutes[13], No Build = 30.6 minutes
- Year 2020, Southbound afternoon commute:
  - With HOV lanes = 50.3 minutes, No Build = 47.6 minutes

Indeed, the only travel time improvements associated with the HOV alternative appear to be relatively minor (10 % or less) and to benefit only counter-commute traffic. Nothing in the reported traffic studies indicates that the HOV lane alternative for the Project will result in substantial attainment of the stated goals. Rather, the reported data appear to support No Build, with its necessarily minimal environmental impact, as the required choice among studied alternatives.

E

5. It is likely that the Project, together with the Sonoma 101 Plan as a whole, will negatively impact water quality

In considering the checklist questions relating to water quality, Caltrans has neglected the impacts which may result from excavation for gravel and other aggregates to be used in the Project. Very large quantities of such materials will be consumed by the Project and by the Sonoma 101 Plan as a whole. It is reasonable to expect, given the existing

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[11] Initial Study, § 1.3, page 7
[12] Initial Study, Table 2-1.1, page 13, *et seq.*
[13] This figure is taken from the Draft Traffic Report, as relevant numbers in the table in the Initial Study appear to have been transposed.

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distribution system and the economics and history of such matters in Sonoma County, that much of this aggregate will be mined from the aquifer of the Russian River.

Caltrans engineers have provided the following substrate and surfacing materials estimates for the Project:

- Asphalt concrete – 50 thousand metric tons
- Cement-treated base – 30 thousand cubic meters
- Aggregate sub-base – 38 thousand cubic meters
- Open-graded asphalt concrete – 25 thousand metric tons

It is reasonable to believe that these estimates, covering, as they do, approximately 8 kilometers of highway widening and interchange modification, represent less than 10% of the materials required for the Sonoma 101 Plan as a whole. Thus, for example, it can be expected that more than 400,000 cubic meters of aggregate sub-base will be required for the overall project.

Given the reasonable expectation that most of the required gravel and other aggregates would be mined from the Russian River aquifer, it is imperative that the likely environmental impacts of such mining be considered. There is no evidence that Caltrans has considered these impacts.

Gravel mining in the Russian River depletes the aquifer which filters the drinking water supply for hundreds of thousands of Sonoma and Marin County residents. Also, collapse of levees separating mining pits from the main channel of the rivers results in large releases of contaminated, turbid water upstream from the collectors operated by the Sonoma County Water Agency. Turbidity has already forced temporary shutdowns of at least one of these collectors during high water.

Reasonable estimates have placed the cost of constructing a water filtration plant, to replace the filtration provided by the river if continuing gravel extraction so damages the aquifer that it can no longer adequately filter our drinking water, at approximately $300 million.[14] Operating costs would require tens of millions of additional dollars annually.

Documentation of the likely environmental impacts associated with increased Russian River aggregate mining on the scale associated with the Project is widely known and available.[15][16][17][18]

Mining activities in the Russian River are subject to Sonoma County's Aggregate Resource Management Plan ("ARM Plan"), which is based, in part, upon forecasts of

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[14] Communication from Miles Ferris of the Santa Rosa Sanitary District, reported in Griffin, L. Martin *Saving the Marin – Sonoma Coast.* Sweetwater Springs Press, Healdsburg, 1998

[15] Collins and Dunne *Fluvial Geomorphology and River-Gravel Mining*. California Division of Mines and Geology, Sacramento, 1990

[16] Curry, Robert R. "Russian River Middle Reach – Aggregate or Aquifer?" Friends of the Russian River Conference Report, Healdsburg, 1994

[17] Florsheim and Williams "Geomorphic and Hydrologic Conditions in the Russian River, California" prepared for the California Coastal Conservancy, 1993

[18] See also the bibliography beginning on page 261, Griffin, L. Martin *Saving the Marin – Sonoma Coast.* Sweetwater Springs Press, Healdsburg, 1998

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demand for aggregate materials. There is no evidence that the vast quantities of materials required by the Sonoma 101 Plan have been included in the demand forecasts. There is no evidence that Caltrans has considered the likely impact of such massive additional mining on the Russian River aquifer and the public water systems dependent upon it or that the agencies responsible for management of gravel mining and public water systems have been included in consultations related to preparation of the Initial Study.

Commenters believe that it is imperative, and a CEQA requirement, that the Initial Study be re-circulated and that input be sought from responsible agencies including, without limitation, the California Division of Mines and Geology, the Sonoma County Water Agency and the Sonoma County Permit and Resource Management Department.

The failure of the Initial Study to consider the likely significant impacts of the Project, and the Sonoma 101 Plan as whole, on the Russian River aquifer and its dependent public water systems, together with the failure to consult with and seek input from responsible state and county public agencies, constitutes a fatal flaw of the Initial Study.

F

6. The Project is likely to negatively impact community facilities

The Project, together with the Sonoma 101 Plan as a whole, is likely to have significant impact on cultural and recreational facilities in the neighboring community. Two obvious examples of such impact are related to the implementation of the next fully funded and approved segment of the Sonoma 101 Plan to the north of the Project, the segment between the Highway 12 interchange and Steele Lane.

The restoration of Santa Rosa Creek through downtown Santa Rosa, the Prince Memorial Greenway project, passes under Highway 101. The project is fully funded and currently under construction. Final construction is expected to be completed by Spring 2001.

Widening Highway 101 through downtown Santa Rosa will have serious negative impacts on Prince Memorial Greenway because it will create an unsafe condition for pedestrians and bicyclists underneath the freeway. The two proposed additional lanes would fill in the median which is currently a light well between the two existing sets of freeway lanes. Once filled in, it will become a dangerous dark tunnel under 6 freeway lanes, inhospitable and unsafe for those underneath.

The Santa Rosa R/UDAT (Regional Urban Design Assistance Team) report, released Nov. 16, 1998, proposes that the Santa Rosa Farmers' Market be located underneath Highway 101 between Morgan and Davis Streets. With the light well filled in, this area will become a dark and noisy place, a place which, it is reasonable to expect, will not support a vibrant pedestrian market R/UDAT's suggestions are being taken very seriously by the City of Santa Rosa, which is considering appointing a full-time staff person to implement the R/UDAT recommendations.

The Initial Study asserts[19] that the Project would not affect any properties on or eligible for the National Register of Historic Places. That is simply not true. The "Historic Railroad Square District" is immediately east of Highway 101 and covers the area from Highway 101 to the railroad tracks between 3rd and 5th Streets. There can be little doubt

[19] Initial Study § 3.12, page 18

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that converting the adjacent freeway to a six lane facility is likely to have significant impacts on the District. F

Caltrans' failure to consider, and adequately study, the likely cultural, recreational and economic impacts resulting from physical changes caused by the Project and the Sonoma 101 Plan as a whole is a serious flaw in the Initial Study. Commenters urge that an EIR be prepared which includes evaluation of impacts to cultural and recreational facilities and that adequate field studies and modeling be performed to effectively evaluate such impacts.

7. The determination that the Project will not affect air quality is unfounded G

The Initial Study, relying upon the associated Air Quality Impact Report, determines that the Project "will not affect air quality in the vicinity of the project" and that "[t]here will be no significant negative impacts." Given that the Project is, in fact, merely a small piece of the Sonoma 101 Plan, these determinations are unfounded and entirely unwarranted, even without considering the novel and, apparently, unproven methodology used to reach them.

Caltrans assures the public that the Project will not affect our air quality, but does not consider, or reveal, that the Project is merely an eight kilometer section of a larger project which will span more than 60 kilometers when completed. Clearly, it is inappropriate to reach any such conclusion without studying the potential impacts of the entire project. In order to make a credible determination regarding the potential impacts on air quality, Caltrans must conduct a study of the real project – the Sonoma 101 Plan.

Conclusion

Commenters are confident that the Comments contained herein provide substantial evidence that the Project, together with the Sonoma 101 Plan as a whole, has the potential to substantially degrade the quality of the environment. Therefore, CEQA requires that an EIR be prepared. Additionally, as outlined above, the Initial Study should be re-circulated to ensure that adequate consultation and input is received from public agencies charged with management of natural resources likely to be impacted by the Project. H

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Respectfully submitted this 28th day of November, 1998 by:

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RESPONSE #37 - LETTER
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Comment Number	Response
37-A	**Independent Utility of the Project**- It has been determined in the initial study that this segment of Route 101 between the Wilfred Avenue Interchange and the Route 12 interchange is the primary connector between the cities of Rohnert Park and Santa Rosa. As such, it has independent utility within the corridor and is projected to reduce existing traffic congestion, and future congestion in the project area. **The Project Segment has Logical Termini** - The Wilfred Avenue interchange and the Route 12 Interchange are logical termini within the corridor. Caltrans highway operations analysis indicates that the segment between these two interchanges is one of the most congested in the Sonoma County corridor. Regardless of whether other projects are built within the corridor, this project will improve traffic flows on this section of Route 101, especially during peak periods. Because of the importance of this project in meeting local and state needs, SCTA has identified this segment as the number one priority for the county's transportation improvement projects to be included in the STIP. The RTP also includes this project, among others in the Sonoma-Marin 101 Corridor. Sonoma County's CMA, the SCTA, used the RTP to prioritize this project and program it into the STIP. Projects submitted for approval should be in both a plan and a program. This project is included in the STIP as a stand alone project; was studied as such in the Initial Study/Environmental Assessment, and is subject to project approval as such by the California Transportation Commission (CTC).
37-B	The Initial Study Checklist reports the results of technical studies and investigations undertaken by Caltrans to determine whether environmental impacts from the proposed project could be potentially significant. The term "naked checklist" usually refers to a checklist that confines itself to "yes" or "no" answers only. CEQA requires an explanation of both the "yes" and "no" responses to the checklist items. Items answered in the original checklist were explained in **Section 5 Discussion of Potential Effects and Proposed Mitigation Measures**. However, effective October 26, 1998, Caltrans became subject to the 1998 CEQA Guideline Revisions. This resulted in the mandated replacement of Appendix I (the old Initial Study Checklist) with a revised and expanded Appendix G. The new Environmental Checklist Form (See **Table 4-3 Environmental Significance Checklist**) has been reorganized and cross-referenced to relate to existing environmental regulations. Responses to the checklist questions are also now ranked via four levels of significance rather than the previous two. As a result, although the conclusions drawn by the technical studies have not changed, the questions used by the new checklist and the degree to which environmental factors are characterized as potentially affecting the project are now represented differently. Whereas the previous checklist required a yes or no answer to whether the impact was significant, the new checklist's use of multiple categories provides a refinement of analysis.

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Comment Number	Response
37-B	(continued) Accompanying the change in the checklist is an attendant change in **Section 5**. In many cases, additional information has been provided to adequately address issues raised by the new Checklist.
37-C	Sonoma County Transportation Authority (SCTA) and MTC initiated a SONOMA US 101 Variable Pricing Study in December 1995. While these variable priced lanes are (commonly referred to as HOV/ Toll Lanes or "HOT Lanes" or express carpool lanes), have been studied for this corridor, such a proposal is not currently included among Sonoma County's list of transportation priorities. However, even thought there is no unified County interest in a pursuing the toll lane project at this time, this does not preclude the installation HOV/Toll Lanes in the future. See Section 2.5.1 for further discussion of HOV/Toll Lanes.
37-D	There were some cases that suggested that freeway travel times would actually increase with the "Build" alternatives (See the shaded areas in **Table 2-6.1**). To address these discrepancies, Caltrans performed additional technical studies (for more information see **Appendix B**) to determine why some of the "Build" alternatives appear to perform more poorly than the "No-Build" alternative. The results of these studies revealed the following: • The traffic model used to forecast future year traffic volumes assigned a disproportionate amount of peak hour traffic to the freeway in the "Build" alternatives than would be consistent with the resulting amount of congestion. If congestion and delays under this alternative occurred, many motorists would have returned to the local arterial system, seeking a less congested route. • Greater delays occur on the on-ramps for the "No-Build" alternative than with either of the widening alternatives. Combining ramp delays with the freeway delays shows that both the HOV +2 lane and Mixed-Flow lane alternatives carry more traffic with less overall delay than the "No-Build" alternative. • Peak hour traffic performance outside of the study limits (North of River Road and South of Route 116 in Cotati) for some combinations of study year and alternatives were not accounted for in the original traffic studies. When additional studies were done to include all congestion related to locations where traffic demand exceeded the capacity (bottlenecks), the HOV +2 Lane alternative would carry more traffic (carpools and non-carpools) than any other alternative and, in the majority of scenarios, have lower travel times than the other alternative. Overall, the results of additional traffic analyses indicate that either of the "Build" alternatives would carry more traffic and, in general, have lower travel times than the No-Build alternative. Although travel times would be reduced in only four of the eight scenarios analyzed for the Mixed-Flow lane alternative, the increases for the remaining scenarios would be a maximum of 2 minutes (year

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Comment Number	Response
37-D	(continued) 2020 northbound A.M. scenario). The HOV lane alternative would, in all but one scenario, provide improved travel times for both carpools and non-carpools compared to the No-Build alternative. The HOV lane alternative would also provide southbound carpools with added timesavings by allowing them to bypass up to 7.3 minutes of congestion in the mixed-flow lanes between Route 12 and the beginning of the freeway bottleneck section at Wilfred Avenue. In addition, the total number of vehicles the facility could handle would be increased in every scenario analyzed for the "Build" Alternatives.
37-E	Although this environmental document refers to the Wilfred Avenue to Hwy 12 section of 101, and not to the Sonoma 101 corridor as a whole, in accordance with Federal and State mandates, cumulative impacts are being considered. Deep Terrace Gravel Mining Pits are required to be at least 450 feet from the Russian River banks. It has been determined that pits located at this distance from the river will not have a significant impact on the groundwater (Sonoma County Aggregate Resources Management Plan and Program Environmental Impact Report, 1994:8.4-2). Additionally, all gravel mining activities along the Russian River's terrace deposits are monitored by the County, per the ARM Plan. Every application made to the County by the two major gravel suppliers which use the terrace mines of the Russian River has been found to have no effect upon the river gradient or the aquifer (Ralph Locke Personal Communication 1998). "Mining activities in the Russian River are subject to Sonoma County's Aggregate Resource Management Plan ("ARM Plan"), which is based, in part upon forecasts of demand for aggregate materials. There is no evidence that the vast quantities of materials required by the Sonoma 101 Plan have been included in the demand forecasts. The ARM plan states "The County General Plan … included numerous policies that affect aggregate operations" (1994:S-1). The Sonoma County General Plan states: The County shall use the following policies applicable to freeways: CT-2m: Designate U.S. Highway 101 as a freeway for its entire length in Sonoma County. Improve to freeway standards as a high priority.

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Comment Number	Response
37-E	(continued) CT-2n: Develop the planned additional travel lanes on Highway 101 to allow for high occupancy vehicles (HOV) and transit use during peak commute periods CT-2o: Consider new interchanges or overpasses at the following intersections with Highway 101: San Antonio Road, Kastainia Road, Rainier Avenue, Old Redwood Highway, railroad Avenue, Corona Road, Bellevue Avenue, Wilson Lane, and Arata Lane. Provide substantial improvements at the following interchanges: Washington Street, Wilfred Avenue, Hearn Avenue, Todd Road, Airport Boulevard, Fulton Road, and Windsor River Road (Sonoma County General Plan, Circulation and Transit Element, March 1989: 374-376). This clearly asserts that the county General Plan has forecasted improvements such at those of the current study for Highway 101. Additionally, the ARM Plan recognizes Caltrans as a "responsible or trustee [agency] with a relationship to the ARM Plan and aggregate mining"(Sonoma County Aggregate Resource Management Plan and Program Environmental Impact Report 1994: 1-6) in Sonoma County. The ARM Plan, based on the policies in the General Plan, does therefore take into account aggregate needs such as the current study would require.
37-F	The current project has minimum impacts upon community facilities. The only facility affected for this project is South Davis Park and a temporary use agreement has been approved for this location. The locales mentioned in this comment (Prince Memorial Greenway, Santa Rosa Farmers Market, Historic Railroad Square District) lie within the proposed project to widen Route 101 between Route 12 and Steele Lane. All such impacts will be studied and disclosed in an environmental document for that project.
37-G	Caltrans addresses the impacts of highway projects on air quality in accordance with the following legislation: the Clean Air Act and its Amendments, the EPA Final Regulations (August 1997), NEPA and CEQA. Additionally, the San

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Comment Number	Response
37-G	(continued) Francisco Bay Area Air Basin has been designated as a maintenance area for Carbon Monoxide (CO) and a non-attainment area for ozone and PM_{10} (state standard) PM_{10} is unclassified for the Federal standard. The air quality utilizes a new protocol developed jointly by Caltrans and the University of California, Davis Institute of Transportation. The EPA approved its use in the Bay Area. FHWA determined that both the 1992-1997 Transportation Improvement Program (TIP) and the corresponding 1995 Regional Transportation Plan (RTP) conform to the Transportation Conformity Rule as amended by the EPA in January 1998. The project is included in the 1998 conforming Regional Transportation Plan and Regional Transportation Improvement Program, and the design concept and scope proposed are essentially the same as the design scope and concept in the RTP and RTIP listings. All applicable Transportation Control Measures are included in this project. MTC's Air Quality analysis of the RTP and TIP analyzes all proposed projects and has determined that they conform to the State Implementation Plan. The Air Quality Impact Report (AQIR) addresses the air quality impact of the proposed project only. The AQIR has determined that this project will not significantly impact the environment. Any future widening in this corridor will be addressed by future air quality studies. We anticipate that future widening projects in this corridor will meet air quality standards as well since other heavily congested corridors have met the same standards. An example of a heavily congested area where air quality meets acceptable standards is the Interstate 80 corridor.
37-H	Please see responses to 37-A through 37-G. The proposed project will not substantially degrade the quality of the environment. Project design has been undertaken in consultation with federal and state resource agencies, the public, and local, state and federal transportation agencies to ensure adequate coordination and minimization of project impacts.